

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 14-10147-MLW

MEMOGNE LAMOTHE  
Defendant.

MOTION TO AMEND PROPOSED  
CONDITIONS OF RELEASE

Defendant, Memogne Lamothe, hereby respectfully submits the following additional condition of release to be incorporated with the proposed conditions of release previously filed in the above referenced matter.

1. On June 18, 2015, defendant made his initial appearance before the court having been indicted for violation of 21 U.S.C. § 846 conspiracy to distribute cocaine base, cocaine and heroin.

2. On June 23, 2015, undersigned counsel filed a motion to release from custody( See Document 35) and a memorandum in support of release with proposed conditions of release incorporated within the memorandum( See Document 36).

3. The defendant seeks to amend the memorandum (Document 36) by incorporating and adding into the proposed conditions of release the condition described in paragraph 4.

4. The defendant shall sign a \$50,000.00 bond secured by the equity in a residence located at 66 Arlington Street, Hyde Park, MA 02136. Proof of the assessed valuation of the property, balance on the mortgage and a certificate of good title will be furnished to the court prior to the defendant's release.

For all the reasons stated above the defendant moves this Honorable Court to allow this Motion and consider the newly proposed condition in determining release of the defendant.

Defendant, by his attorney,

/s/ Carlos J. Dominguez

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Suite G3  
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BBO # 567005

Date: 09/11/2015

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing document was served this 11th day of September, 2015 via ECF Filing System to all interested parties.

/s/ Carlos J. Dominguez

CARLOS DOMINGUEZ